



# **There Remains a Rational Basis for Rent Stabilization in College Park, MD**

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Submitted by:  
Sage Policy Group

Submitted to:  
The City of College Park

March 2012

# There Remains a Rational Basis for Rent Stabilization in College Park, MD

## Executive Summary

### Introduction

The City of College Park hired Sage Policy Group, Inc. (Sage) to conduct an assessment of whether rent stabilization still commands a rational basis in a City of College Park context. The report shares significant similarities with the original study conducted in 2005 and a subsequent update in 2009. Both of those studies determined that a rational basis exists with respect to the City’s rent stabilization program.

Much has transpired since the 2009 report. In particular, several high-rise apartment buildings catering to students among others have emerged along Route 1. There has also been an intervening housing crisis, one associated with significant numbers of foreclosures and foregone homeownership. The question is whether or not these and other events have served to undermine the presence of a rational basis during the intervening three years. This report finds that a rational basis still exists, but that there may be a time over the next several years during which arguments in favor of rent stabilization become increasingly weak.

As with the original report, Sage determined that the community continues to maintain an interest in stable owner occupancy. Owner occupancy is not only associated with greater civic engagement, but this study also finds an ongoing correlation between rental status and the number of code violations on a per unit basis. Specifically, owner occupied units are associated with roughly one-fourth the level of violations on a per unit basis compared to renter occupied units that are subject to the existing rent stabilization ordinance (please see Exhibit E1 below).

Exhibit E1: Violations per housing Unit

	Housing Units		Total Violations		Violations/Unit	
	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied	Owner Occupied	Renter Occupied
College Park, MD 2011	3,276	1,124	788	1005	0.24	0.89

Source: City of College Park

Homeownership in the City of College Park has declined in recent years. In 2004, the proportion of owner-occupied units was 57 percent. The latest Census Bureau data indicate that the proportion has sunk to 46 percent (2010; please see below).

Exhibit E2: Housing Unit Breakdown in College Park, Prince George’s County and Maryland, 2000, 2004, 2008, and 2010 Estimates

Area	Share of Owner-Occupied Housing Units				Renter Share of Occupied Housing			
	2000	2004	2006-2008	2010	2000	2004	2006-2008	2010
<b>College Park, MD</b>	57.2%	57.4%	55.0%	<b>45.7%</b>	42.8%	42.6%	45.0%	<b>54.3%</b>
Prince George’s County	61.8%	63.1%	65.2%	62.8%	38.2%	36.9%	34.8%	37.2%
Maryland	67.7%	68.8%	69.4%	67.5%	32.3%	31.2%	30.6%	32.5%

Source: U.S. Census Bureau, Decision Data

Some of this decline in owner-occupancy was anticipated. The City purposefully adopted strategies to accommodate multi-story student housing and this would have the natural tendency of increasing the share of rental households. Undoubtedly, some of this decline in owner occupancy is associated with the most recent economic downturn and its disproportionate impact on the owner-occupied segment of the

local economy. However, the predicted loss in owner-occupancy should not be interpreted as indicating diminished commitment to securing and stabilizing owner-occupied neighborhoods among College Park policymakers. The City maintains policies specifically designed to encourage homeownership.

In fact, it should be noted that one of the original motivations for rent stabilization was to reduce incentives to convert owner-occupied dwellings into rentals, including in older neighborhoods adjacent to the University. That motivation remains relevant, particularly considering that since rent stabilization was authorized, the City of College Park has transitioned from a community associated with a majority of owner-occupied units to a city with a minority of them.

Moreover, because of the emergence of the high-rises, there is not the level of rental housing scarcity proximate to the University that existed in 2005. That said, rent associated with the high-rises tends to be more expensive than rent associated with units in converted rental housing (Exhibit E3). Rent stabilization has the effect of stabilizing rent increases in the portion of the rental stock presently most affordable while working to soften the pace of rental conversions.

Exhibit E3: Student Oriented Apartment Properties Off-Campus, Associated Per Bedroom Monthly Rents

	<u>Units</u>	<u>Beds</u>	<u>Studio</u>	<u>1 Bedroom</u>	<u>2 Bedroom</u>	<u>3 Bedroom</u>	<u>4 Bedroom</u>
Enclave at 8700	94	369			\$1,000	\$1,000	\$925
Mazza GrandMarc	230	626			\$1,037	\$949	\$805
Towers at University Town Center	244	910			\$979	\$1,020	\$794
University View I & II	507	1,562	\$1,313		\$993		\$880
Varsity	259	902		\$1,452	\$1,202	\$1,002	\$970

Source: Anderson Strickler, LLC, "University of Maryland, College Park 2011 Student Housing Market Analysis," November 22nd, 2011, Table 5.

There is also an uncomfortably high level of vacancy in certain rental high-rises. Until this vacancy is addressed, it may make sense for the City of College Park to continue attempting suppression of rental conversions through rent stabilization to induce a higher fraction of renters to move into the new high-rises. Not only does this encourage owner occupancy, it also helps stabilize the market for professionally-managed units that are less likely to be associated with substantial numbers of code violations and add to the City's tax base.

There may, however, come a time when the development of this generation of rental high-rises comes to a close. Once a steady state of rental activity in those high-rises has been achieved, and if the supply of high-rises is sufficient to bring rental rates down, the City may no longer have as much demand for a rent stabilization program. Though rational basis may still persist, thereby protecting the City from legal challenge, the public policy rationale would be weaker by that point.

## There Remains a Rational Basis for Rent Stabilization in College Park, MD

### Introduction

During the spring of 2005, Sage Policy Group, Inc. (Sage) authored a report indicating that there existed a rational basis for a then-contemplated rent stabilization program/ordinance in the City of College Park, MD. The study team arrived at its conclusion based upon a combination of data analysis and literature review regarding the history of rent stabilization in the U.S. In its 2005 report, the study team wrote that the program is likely to be conducive to the achievement of the following desired policy outcomes:

- stable rents that promote housing affordability;
- enhanced homeownership; and
- fewer violations of the City Code.

Certain key aspects of economic life have changed since 2005. The steep economic downturn and mild recovery has arguably rendered affordability even more of an issue. Homeownership has been declining in much of the nation since the housing downturn became apparent after 2005 – this also characterizes the College Park marketplace. Moreover, a number of large-scale apartment buildings have been constructed in College Park. Nearly 3,500 new student beds have entered the market both on- and off-campus since 2009 and more than 5,000 have been added since 2006 (Exhibit 1). A large portion of this growth has been concentrated in new, high-end, individual-lease properties near the University, often along Route 1.

Exhibit 1: Newly constructed rental units in College Park, 2009-2011

Year		Number of Beds	Number of Units
2009	South Campus Commons #7 (on campus)	368	N/A
2010	Mazza GrandMarc	626	230
2010	University View 2	517	154
2011	The Varsity	901	258
2011	The Enclave	369	94
2011	Oakland Hall (on campus)	709	N/A
<i>Total on-campus</i>		<i>1077</i>	<i>N/A</i>
<i>Total off-campus</i>		<i>2413</i>	<i>736</i>
<b>Total 2009-2011</b>		<b>3,490</b>	<b>736</b>

This report updates data for key categories of interest, including rent levels, homeownership rates and code violations. As with prior Sage studies on this subject, the report does not address the issue of whether or not the City should retain or reform its rent stabilization ordinance. The study team is merely focused upon the question of whether a rational basis for such a policy still exists.

## Key Analytical Findings

### 📌 Homeownership is still falling in College Park, MD

One of the primary objectives of the original rent stabilization ordinance was to reinforce homeownership by diminishing the incentive for homeowners to convert their properties into rental units. Available data indicate that there remains a public policy rationale for attempting to constrain the pace of rental conversion based on ongoing declines in homeownership and the pace of rental conversions.

Homeownership declined between 2006-2008 and 2010 during a period associated with the Great Recession and its aftermath. Homeownership declined at both the county and state level, but the pace of homeownership decline was more rapid in College Park. Between 2006-2008 and 2010, homeownership in the city declined by nearly 10 percentage points, from 55 percent to 46 percent. The corresponding rates of decline in Prince George’s County and Maryland were 2.5 percent and 2.0 percent, respectively (Exhibit 2).

Exhibit 2: Housing Unit Breakdown in College Park, Prince George’s County and Maryland, 2000, 2004, 2008, and 2010 Estimates

Area	Share of Owner-Occupied Housing Units				Renter Share of Occupied Housing			
	2000	2004	2006-2008	2010	2000	2004	2006-2008	2010
<b>College Park, MD</b>	57.2%	57.4%	55.0%	<b>45.7%</b>	42.8%	42.6%	45.0%	<b>54.3%</b>
Prince George's County	61.8%	63.1%	65.2%	62.8%	38.2%	36.9%	34.8%	37.2%
Maryland	67.7%	68.8%	69.4%	67.5%	32.3%	31.2%	30.6%	32.5%

Source: U.S. Census Bureau, Decision Data

Two separate sources of data allowed Sage to estimate the pace of rental conversion in recent years, specifically for the period 2005-2011. The first data series pertains to number of residential occupancy permits issued by the City of College Park. In 2005, the number of permitted single-family/townhomes used for rental purposes equaled 607. By 2011 this figure had risen to 822, indicating that the number of owner-occupied properties converted to rental increased by 215 units (2005 vs. 2011). A second data source confirms the validity of this estimate. According to City of College Park refuse fee revenue data, there were 215 more converted units in 2011 subject to refuse charges relative to the 2005 level. In other words, both sources of data indicate that the number of converted units has increased over time. Exhibit 3 reflects the expansion in converted units.

One can conjecture that the growing emphasis on renting as opposed to homeownership as well as the desire to pursue the lower rents often associated with converted owner-occupied housing have motivated an ongoing increase in the pace of rental conversion over time. Households struggling to meet mortgage obligations also played a role by creating a larger market for conversions. This set of circumstances is also likely a reflection of College Park’s vast rental demand, which is largely attributable to the presence and ongoing growth of the University.

Exhibit3: Conversions of Owner-Occupied Housing to Rental Units Based Upon Occupancy Permit Data

Year	Total Residential Rental Occupancy Permits Issued, Single-Family/Townhouses
2005	607
2011	822
Total Conversions2005-2011	215
Source: City of College Park, MD. Public Services Department	

The notion that the City of College Park desires broad homeownership from a public policy perspective is underscored by certain measures it has adopted to encourage homeownership and reverse conversion trends. For instance, through its New Homeownership Grant program, the City of College Park offers up to \$5,000 in grant assistance on a first-come, first-serve basis to promote conversion of single-family rental properties to owner-occupied housing and to encourage police officers and city employees to make their homes in College Park.

✚ Rents are still rising in College Park according to available data

Exhibit 4 indicates that since 2005, rents have been on the rise. This represents another source of rational basis for rent stabilization. It should be noted that the period lasting from 2005-2011 included a number of very weak years for the economy. Despite that, rents rose. Exhibit 5 provides statistical detail regarding University View I & II rent levels over time.

Exhibit 4: Median Monthly Rental Rates for 2BR and 3BR, 2005 and 2011

2005	2BR	3BR
Student Survey-Single Students	\$983	-
Student Survey-Married/Family	\$1,093	\$1,406
2011		
Survey-Single Undergraduates (adjusted to per unit)	\$1,300	\$1,584
Survey-Married/Family Undergraduates	\$1,125	\$1,500
Survey-Single Grad Students (adjusted to per unit)	\$1,300	\$1,509
Survey-Married/Family Grad Students	\$1,300	\$1,700
Sources: 1. Anderson Strickler, LLC, "Student Housing Market and Feasibility Study, University of Maryland, College Park," July 6, 2005, Table 13 2. Anderson Strickler, LLC, "University of Maryland, College Park 2011 Student Housing Market Analysis," November 22nd, 2011, Table 6		

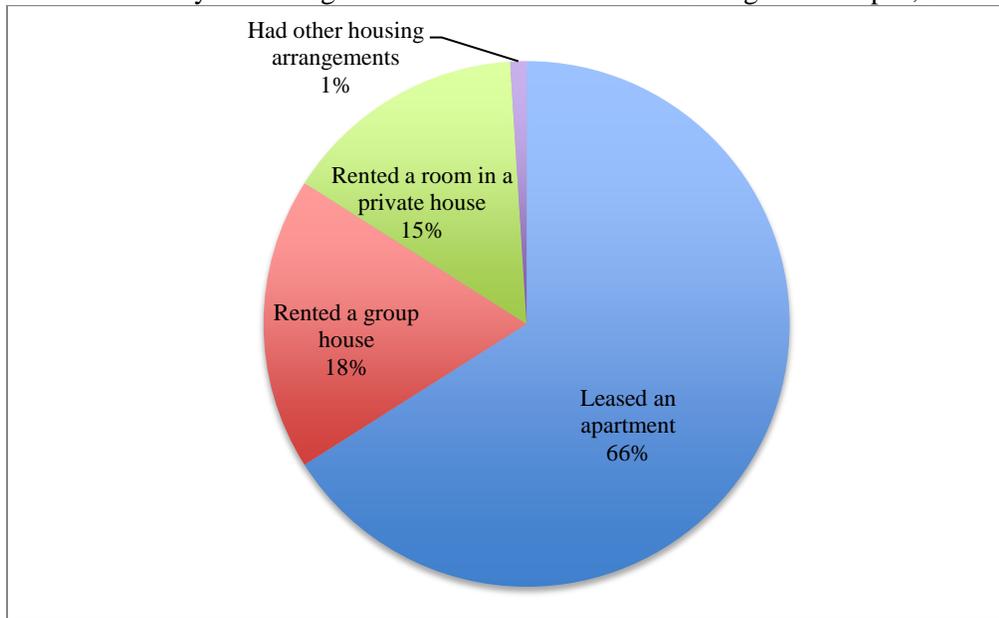
Exhibit 5: Rents at University View I & II over Time, 2005/6 v. 2011

	Unit Type/2005-06 Rents			2011 Rents	
	2BR/2BA	4BR/2BA	4BR/4BA	2 Bedroom	4 Bedroom
University View I & II	\$770-\$845	\$705-\$750	\$725-\$775	\$993	\$880
Sources: 1. Anderson Strickler, LLC, "Student Housing Market and Feasibility Study, University of Maryland, College Park," July 6, 2005, Table 13; 2. Anderson Strickler, LLC, "University of Maryland, College Park 2011 Student Housing Market Analysis," November 22nd, 2011, Table 6					

Rents at the newly constructed high-rises are generally higher than the rents in converted owner-occupied dwellings. Survey data indicate that these high rents often represent a barrier to inducing University students to live in professionally-managed high-rise settings. In fact, even with the provision of rental units in several new high-rise buildings, the proportion of students

living off-campus who resides in non-apartment settings remains significant. Exhibit 6 indicates that that proportion is roughly one-third.

Exhibit 6: Survey of Undergraduate & Graduate Students Living Off-Campus, 2011



Source: Anderson Strickler, LLC , “University of Maryland, College Park 2011 Student Housing Market Analysis,” November 22nd, 2011, p. 3.

Exhibit 7 provides statistical detail regarding rents at several high-rise buildings. Note that the rents at these rises tend to be above \$900/bedroom. That renders them more expensive than the typical rented room in a single-family setting.

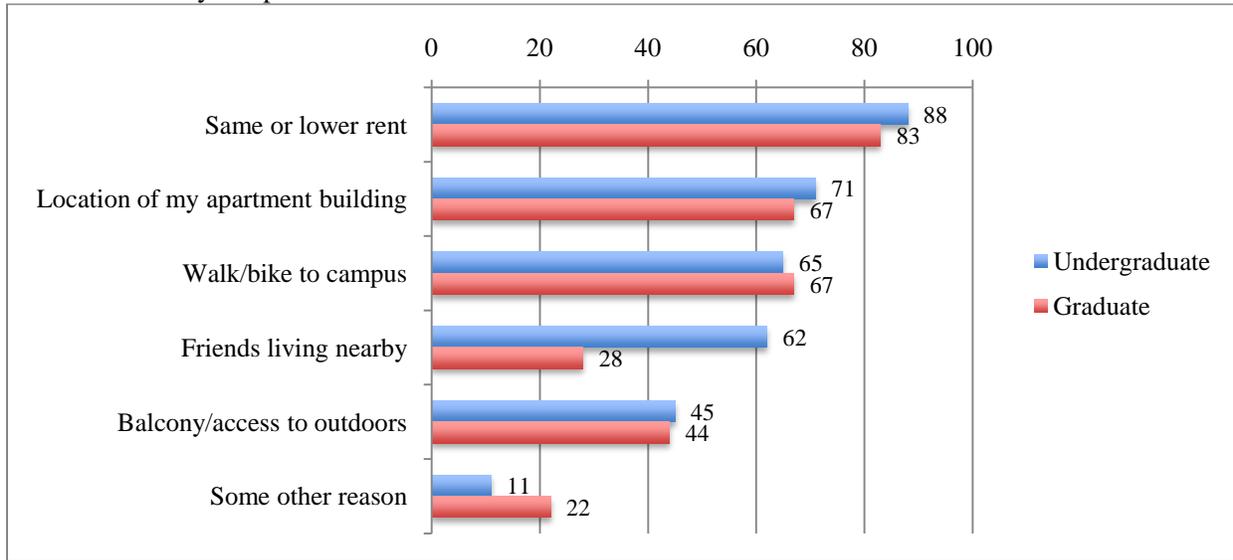
Exhibit 7: Student Oriented Apartment Properties Off-Campus, Associated Monthly Per Bedroom Rents

Property	Units	Beds	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Enclave at 8700	94	369			\$1,000	\$1,000	\$925
Mazza GrandMarc	230	626			\$1,037	\$949	\$805
Towers at University Town Center	244	910			\$979	\$1,020	\$794
University View I & II	507	1,562	\$1,313		\$993		\$880
Varsity	259	902		\$1,452	\$1,202	\$1,002	\$970

Source: Anderson Strickler, LLC , “University of Maryland, College Park 2011 Student Housing Market Analysis,” November 22nd, 2011, Table 5

The rents being charged are presumably in part a function of the cost of construction. These high rents are likely contributing to vacancy. By Anderson Strickler’s estimation, the “five individual-lease properties close to campus with almost 4,400 beds have over 630 vacancies, the equivalent of a 14 percent vacancy rate. Exhibit 8 reflects the fact that many students are on the hunt for lower rents.

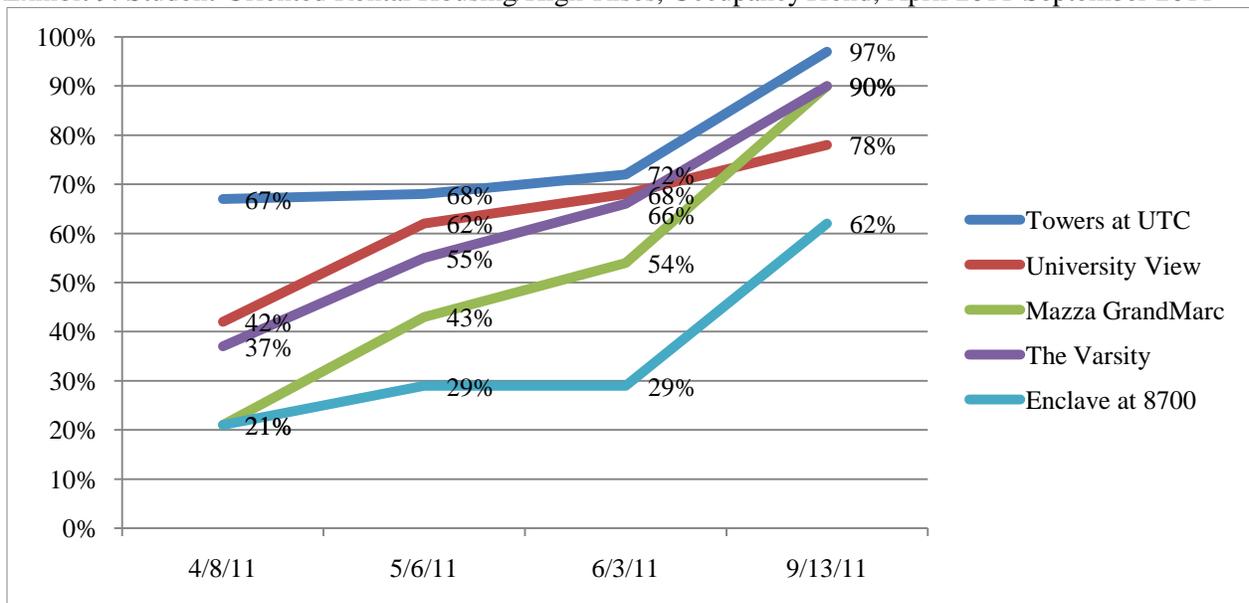
Exhibit 8: Factors That Would Motivate Student College Park House Renters to Move to Apartments, Percent of Survey Respondents



Source: Anderson Strickler, LLC, “University of Maryland, College Park 2011 Student Housing Market Analysis,” November 22nd, 2011, P. 48-50.

Exhibit 9 below reflects occupancy trends for these five properties. Notice that for one of them (Enclave at 8700), occupancy fell short of two-thirds through September 2011. One of the arguments for rent stabilization is that additional rental conversions will serve to drain the supply of available renters, making the pursuit of sufficient occupancy at the high-rises more challenging.

Exhibit 9: Student-Oriented Rental Housing/High-Rises, Occupancy Trend, April 2011-September 2011



Source: Anderson Strickler, LLC, “University of Maryland, College Park 2011 Student Housing Market Analysis,” November 22nd, 2011.

An additional consideration is that there is a significant pipeline of new potential construction in College Park that the City may want to support to create even greater rental choice and additional tax base. This pipeline is represented in Exhibit 10 below.

Exhibit 10: Pipeline of New Construction, College Park

Project	Number of Beds	Number of Units	Parking Spaces	Retail/Other (SF)
Maryland Book Exchange	1,010	341	321	14,300
University View Village (Phases III and IV)	992			
Phase III		104	470	10,530
Phase IV		168	N/A	8,430
Enclave at 8700 (Phase II)	296	83	N/A	
The Domain at College Park*	N/A	258	N/A	11,400
Mosaic at Turtle Creek**	N/A	300	335	N/A
<b>Total</b>	<b>2,298</b>	<b>1,254</b>	<b>1,126</b>	<b>44,660</b>

Source: Anderson Strickler, LLC , “University of Maryland, College Park 2011 Student Housing Market Analysis,” November 22nd, 2011, P. 41-42.

✚ City code violations are still higher among rental units

Exhibit 11 presents first notice code violations for 2011 for residential rental (all rental units) and owner-occupied categories by type of violation. In 2011 there were more first notice code violations at residential rental units than at owner-occupied units. This is a pattern Sage has been observing over time. This represents another source of rational basis since presumably the City would prefer to deal with fewer violations and broader homeownership would be associated with that outcome.

Exhibit 11: College Park, MD First Notice Code Violations by Type and Housing Breakdown, Exterior Property Maintenance Only, 2011

Code Violation	Residential Rental <sup>1</sup>	Owner-Occupied
Grass and Trash	301	297
Inoperable Vehicles	44	82
Vehicle Parked in Grass	94	36
Graffiti	0	0
Toters	215	88
Trash Out Early	0	1
Illegal Signs	2	2
Litter	200	80
Dumpster	6	23
Miscellaneous	27	13
Zoning Violations	31	18
<b>Total Listed Violations</b>	<b>920</b>	<b>640</b>
<b>Total All Violations</b>	<b>1,005</b>	<b>788</b>

Source: City of College Park, MD

<sup>1</sup> In Sage’s original report, the term “residential rental” was used to describe rental conversions. For present purposes, residential rental refers to all renter-occupied housing in College Park.

Using 2011 data supplied by the City of College Park, Sage was able to establish the number of violations per unit for the group of units subject to rent stabilization. This ratio can be compared with the corresponding ratio of violations to units in the owner-occupied category. According to these data, the number of violations per unit for those units subject to rent stabilization is 0.89. This is nearly four times higher than the corresponding yield for owner-occupied units, which is 0.24. Exhibit 12 provides relevant statistical detail.

Presumably, the City of College Park would prefer to minimize the number of violations both to improve quality of life and to reduce associated administrative costs. This serves as another source of rational basis for rent stabilization. To the extent that rent stabilization induces slower rental conversion and encourages a higher fraction of the rental market to live in professionally-managed settings, violation counts are likely to be reduced.

Exhibit 12: Violations per housing Unit

	Housing Units		Total Listed Violations		Violations/Unit		Total All Violations		Violations/Unit	
	Owner Occupied	Renter Occupied	Owner	Renter	Owner	<b>Renter</b>	Owner Occupied	Renter Occupied	Owner	<b>Renter</b>
College Park, MD										
2011	3,276	1,124	640	920	0.20	0.82	788	1,005	0.24	0.89
Source: City of College Park, MD										

## Conclusion

- ✚ There remains a rational basis for rent stabilization in College Park

Based on declining homeownership, the ongoing need for rental affordability, the correlation between rental status and number of violations per unit and the lingering vacancies at newly-constructed high rises, there remains a rational basis for rent stabilization in a City of College Park context. Key analytical findings include the following:

- Homeownership has declined more quickly in College Park than in the county or the state;
- The population of converted, previously owner-occupied units has expanded since 2005;and
- Owner-occupied units are associated with lower levels of violations per unit.

Conversion from owner-occupancy to rental has continued in recent years despite the rent stabilization ordinance, at least in part due to distress within the owner-occupied segment of the community's housing market and the resulting increase in the population of homes available for conversion.

There may, however, come a time when the development of this generation of rental high-rises comes to a close. Once a steady state of rental activity in those high-rises has been achieved, and if the supply of high-rises is sufficient to bring rental rates down, the City may no longer have as much demand for a rent stabilization program. Though rational basis may still persist, thereby protecting the City legally, the public policy rationale would be weaker by that point.

## Appendix

- Housing Unit Absolute Totals – Census Bureau

Exhibit A1 reflects the number of owner-occupied and renter-occupied housing units in College Park based upon U.S. Census Bureau data for three separate periods. These figures relate to the percentage figures presented in the body of the report (see Exhibit E2 and Exhibit 2).

Exhibit A1: Housing Unit Breakdown in College Park, Prince George’s County and Maryland, 2000, 2008, and 2010 Estimates

Area	Owner-Occupied Housing Units			Renter-Occupied Housing Units		
	2000	2006-2008	2010	2000	2006-2008	2010
<b>College Park, MD</b>	3,448	3,277	3,087	2,582	2,684	3,670
Prince George's County	177,177	194,551	190,993	109,433	103,888	113,049
Maryland	1,341,751	1,449,301	1,455,775	639,108	637,527	700,636

Source: U.S. Census Bureau, 2000 Census, ACS 3-year Estimates, 2010 Census

- Census Data Discussion

A discussion with City staff during a work session exposed a desire to understand the difference between various Census estimates. The 2006-2008 data represent 3-year estimates originating from the American Community Survey or ACS. The 2006-2008 estimates represent “period” estimates collected over a 36-month time period while the decennial census statistics represent specific “point-in-time” estimates.

### Implication for analysis

Comparing period estimates with “point-in-time” estimates produces a few issues, none of which fundamentally undermine the quality of analysis. Broad population characteristics will frequently remain consistent in an area throughout a given calendar year. To the extent that this assertion is true, period estimates may not look very different from “point-in-time” survey estimates (like the decennial census point-in-time estimates). Accordingly, the two types of estimates are more likely to diverge during periods of rapid population/demographic change. In the instance of College Park, there was dynamic change in the economic environment in recent years due to the emergence of several rental high-rises.

Exhibit A2 provides three-year estimates for housing units. The body of this report uses 2010 decennial Census data to drive the analysis rather than the 2008-2010 period estimates. Given the rapid change in economic conditions between 2008 and 2010, it seems reasonable to use the 2010 figure as a basis for analysis and comparison with prior periods. Had the 2008 to 2010 period been more stable from economic, demographic and development perspectives, the study team would likely have relied more heavily upon the three-year period estimate for 2008 to 2010. The point is that the 2008 and 2009 estimates that are embodied in this three-year period do not fully reflect the dynamic change that has occurred in College Park and therefore relying upon a simple 2010 point-in-time estimate seems preferable.

Exhibit A2: ACS 3-year Housing Unit Estimates, College Park, Prince George's County & Maryland

	Share of Owner-Occupied Housing Units		Share of Renter-Occupied Housing Units	
	<u>2005-2007</u>	<u>2008-2010</u>	<u>2005-2007</u>	<u>2008-2010</u>
<b>Percentages</b>				
<i>College Park, MD</i>	57.4%	52.1%	42.6%	47.9%
Prince George's County	64.8%	63.1%	35.2%	36.9%
Maryland	69.4%	68.2%	30.6%	31.8%
	Share of Owner-Occupied Housing Units		Share of Renter-Occupied Housing Units	
	<u>2005-2007</u>	<u>2008-2010</u>	<u>2005-2007</u>	<u>2008-2010</u>
<b>Absolute Numbers</b>				
<i>College Park, MD</i>	3,204	3,371	2,380	3,094
Prince George's County	193,318	190,060	104,953	111,086
Maryland	1,445,426	1,447,968	637,147	674,801

Source: U.S. Census Bureau, ACS 3-year estimates

Exhibit A3 illustrates the implications of using 2010 decennial Census data for analytical purposes rather than the 2008-2010 period estimate. Note that the 2010 point-in-time estimate is associated with substantially lower owner-occupancy in percentage terms than the three-year estimate.<sup>2</sup> This is a reflection of the impact of 2008 and 2009 in the 3-year data; years that do not as fully reflect the construction of rental high-rises in College Park. Therefore, using the 2010 point-in-time estimate arguable represents a better way to understand the city's current circumstances along the dimension of owner-occupancy. It is difficult, however, to know from these data what portion of shrinking owner-occupancy was due to the emergence of the high-rises as opposed to the housing market downturn that impacted this period of economic history.<sup>3</sup>

Exhibit A3: Comparison between 3-Year ACS and Decennial Census Point-in-Time Estimates

Area	Share of Owner-Occupied Housing Units		Difference between multi-year estimate and point-in-time estimate
	<u>2008-2010</u>	<u>2010</u>	
<b>College Park, MD</b>	52.10%	45.70%	-6.40%
Prince George's County	63.10%	62.80%	-0.30%
Maryland	68.20%	67.50%	-0.70%
	Share of Owner-Occupied Housing Units		Difference between multi-year estimate and point-in-time estimate
	<u>2008-2010</u>	<u>2010</u>	
<b>College Park, MD</b>	3,371	3,087	-284.00
Prince George's County	190,060	190,993	933.00
Maryland	1,447,968	1,455,775	7807.00

Source: U.S. Census Bureau, ACS 3-year estimates

<sup>2</sup> It should be noted that there are different residency definitions between the decennial Census and the American Community Survey. The decennial Census uses a "usual residence" rule to enumerate people at the place where they live or say most of the time as of April 1<sup>st</sup> of the subject year. The ACS, by contrast, uses a "current residence" rule to interview people who are currently living or staying in the sample housing unit as long as their stay at that address will ultimately exceed two months. The difference in residency definitions should not fundamentally alter key analytical findings.

<sup>3</sup> One should be cautious when comparing data from 2000-2005 surveys with data from 2006 and later surveys. "Unlike earlier surveys, the 2006 ACS survey includes samples of the population living in group quarters (e.g., college dorms and nursing homes), so the data may not be comparable, especially for young adults and the elderly, who are more likely than other age groups to be living in group quarters facilities." (Source: U.S. Department of Commerce, Economics and Statistics Administration, U.S. CENSUS BUREAU, "A Compass for Understanding and Using American Community Survey Data, *What General Data Users Need to Know*," October 2008.)